

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	No. 3:18-CR-0097
v.	:	
	:	(Mariani, J.)
ROSS ROGGIO, and	:	
ROGGIO CONSULTING CO, LLC	:	
Defendants.	:	

GOVERNMENT'S PROPOSED *VOIR DIRE*

The United States, through its undersigned attorneys, respectfully requests that the Court conduct the following *voir dire* of prospective jurors pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure, in addition to any standard questions asked by the Court.

Dated: April 25, 2023

Respectfully submitted,

GERARD M. KARAM
UNITED STATES ATTORNEY

/s/ Todd K. Hinkley
Todd K. Hinkley
Assistant U.S. Attorney
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KENNETH A. POLITE, JR.
Assistant Attorney General

/s/ Patrick Jasperse

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Trial Attorney

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Human Rights and Special

Prosecutions Section

MATTHEW G. OLSEN.

Assistant Attorney General

/s/ Scott A. Claffee

Scott A. Claffee

Trial Attorney

National Security Division

U.S. Department of Justice

Counterintelligence and Export

Control Section

PROPOSED VOIR DIRE QUESTIONS

1. Have you read, seen, or heard anything about this case in the media? If so, have you formed an impression or opinion about the merits of this case?
2. The witnesses in this case will include law enforcement personnel. Would you be *more* likely to believe a witness merely because he or she is a law enforcement officer? Would you be *less* likely to believe law enforcement witnesses?
3. Have you, or has any family member or close friend, ever had a dispute or bad experience with the United States Government or an employee, official, or agency of the federal government?
4. Have you, or has any family member or close friend, ever lived in, served in, or otherwise visited the country of Iraq? If so, is there anything about your experience in Iraq that would affect your ability to fairly and impartially consider the evidence in this case and the court's instructions?
5. The charges in this case include allegations of torture and conspiracy to commit torture under color of law in the country of Iraq. Is there anything about that proposition that would affect your ability to fairly and impartially consider the evidence in this case and the court's instructions?
6. Does anyone have strong feelings or problems one way or the other with a criminal prosecution for the crime of torture, as defined by the court?
7. The charges in this case also include allegations of illegally exporting firearm parts to the country of Iraq. Is there anything about that proposition that would affect your ability to fairly and

impartially consider the evidence in this case and the court's instructions?

8. Do you have any bias or prejudice for or against the United States Department of State, the United States Department of Commerce, or the regulation of exports and export licensing requirements?
9. Have you, or has any family member or close friend, ever been involved in any legal dispute with the United States Government or any agency of the United States? Or been in a dispute with a government agency that issues export licenses?
10. Do you, or does any family member or close friend, have any training, expertise or experience in the import or export business, the business of freight forwarding, or the business of overseas shipping and transport?
11. Do you, or does any family member or close friend, have any training, expertise, or experience with manufacturing, selling, purchasing, or transporting firearms or firearm parts?

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.

That on April 25, 2023, he served a copy of the attached:

GOVERNMENT'S PROPOSED VOIR DIRE

via ECF on Gino Bartolai, Esq., counsel for defendants.

s/ Todd K. Hinkley
TODD K. HINKLEY
Assistant U.S. Attorney